

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, : **NOTICE OF MOTION**
:
-against- : 16-CR-832 (KMK)
:
NICHOLAS TARTAGLIONE, :
:
Defendant. :

PLEASE TAKE NOTICE THAT, upon the accompanying declaration and memorandum of law, the defense will move this Court before the Honorable Kenneth Karas, at the United States District Court for the Southern District of New York, 300 Quarropas St., White Plains, New York 10601, for an Order:

1. Suppressing the cell site location data (“CSLI”) recovered by the government without a warrant; and
2. For such other relief as the Court deems just and proper.

Dated: Garden City, New York
August 1, 2019

BARKET EPSTEIN KEARON ALDEA
& LOTURCO, LLP

/s/Bruce Barket
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